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VIA FACSIMILE

Hon. Loretta A. Preska
United States District Courthouse
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007

Re: Robert Altadonna, et al. v. Broome Mercer Corporation, et al.
Docket #: 07 Civ. 6668 (LAP)

Dear Judge Preska:

We represent the Plaintiffs in the above-referenced matter. I write to request a 30-day extension of the discovery deadline in order to conduct follow-up discovery after the depositions of Defendants.

In this case there has been one previous request to extend the discovery deadline, made by Defendants. On March 12, 2008 the Court granted Defendants' request to extend the discovery deadline to May 15, 2008. Following the Court's March 12th order, Defendants rescheduled the previously scheduled depositions of plaintiffs, and did not confirm rescheduled dates for the depositions of defendants until March 28, 2008. Defendants are now currently scheduled to be deposed on April 28th and 29th.

We have recently come across information in the case that we believe will necessitate follow-up discovery after the depositions of the Defendants, and we therefore request a 30-day extension of the discovery deadline to allow for such discovery.

We have advised opposing counsel of our intention to submit this request and counsel does not oppose our request. Thank you for your consideration of this matter.

Respectfully submitted,

Carolyn Horan

cc: Adam Kleinberg, Esq. (via fax)